## **EXHIBIT 1**

# 2020-01-30 Common Cause 67/0-AJN-SN Document 190-1 Filed 01/31/20 Page 2 of 35 NY State Report by person

Date Range: 1/1/2018 - 1/30/2020

rson	Matter	Date	Activity	Comment	Hours
ckson Ch					
	CommCau		CauseState CommCa		
		11/16/2018	•	declarations	1.30
		11/19/2018	Telephone Call	Plts co counsel strategy call; discussing discovery activity and amending complaint	0.70
			Telephone Call	cocounsel call with CC Susan Lerner	1.00
		11/30/2018	Discovery	review draft Plts ROGs, RFD; draft amended complt; reply to Neil	1.20
		12/4/2018	Email Exchange	find time for Esq to discuss discovery response	0.10
		12/10/2018	Telephone Call	co-counsel review of discovery, response to Def rogs, etc, possible experts	0.80
		2/14/2019	Telephone Call	Group counsel with Susan Lerner/CC on planning for discovery	1.00
		2/19/2019	Telephone Call	co-counsel discussion on discovery, doc production from Def. 45min	0.80
		2/27/2019	Document Review	rev email and Q&As of proposed experts	0.30
		2/28/2019	Document Review	Dechert staff / IT setup to access Relativity	0.30
		3/7/2019	Discovery	Neil email on getting deposition dates.	0.10
		3/8/2019	Document Review	BoE ROG response chart	0.20
		3/8/2019	Discovery	rev John Powers email discussion on possible depositions of Def Ws, dates, logistics	0.40
		3/14/2019	Meetings	talk with LCCRUL co-counsel John Powers on my limited role in depositions, discovery doc review, as non-lead counsel	0.80
		3/21/2019	Email Exchange	suggest added words / search terms to Dechert Thayruni for use in early discovery records software searches	0.30
		3/25/2019	Conference Call	discovery review with co-counsel	0.50
		4/1/2019	Conference Call	last 10 minutes of discussion on discovery experts, possible deposition dates and lists	0.20
		4/4/2019	Conference Call	discussion	0.40
		4/4/2019	Conference Call	setting up conf call with Susan Lerner, etc	0.50
		4/5/2019	Document Review	deposition notices, subpoenas, new Albany office locations on depositions	0.30
		4/5/2019	Email Exchange	decision not to attend Albany-based depositions, notify cocounsel, JP	0.30
		4/15/2019	Document Review	review co-counsel John Power tactical info and notes on his depos of Valentine and	0.80
		4/16/2019	Telephone Call	co-counsel discuss draft report by expert Mark Meredith; what to review with him, making depo trscrps available to him	0.90
		4/17/2019	Document Review	download and scan depo transcripts rec'd from co-counsel	0.80
Dro	pared by Click	Time on 1/30/202	0 11:51:50 AM	www.clicktime.com	Page

	Case 1:17-cv-0677	0-AJN-SN Document 190-1 Filed 01/31/20 Page 3 of 35	
4/19/2019	Email Exchange	review co-counsel and Def counsel echanges	0.40
4/22/2019	Email Exchange	co-counsel exchange qs and comments on pre-deposition	0.40
4/23/2019	Email Exchange	review co-counsel comments on yesterday's deponent, possible docs, valuable admission; need to confirm Susan Lerner depo prep dates; Dechert's notices of depo dates and location; John and Neil exchange on draft request to Def counsel vis how best to address list of plts witnesses and Def still missing docs	0.80
4/23/2019	Email Exchange	Comment to co-counsel on proposed depo stenographer errata sheets	0.10
4/24/2019	Document Review	emails re cocounsel discovery qs	0.30
4/29/2019	Document Review	review draft expert report by Meredith	1.00
5/1/2019	Meetings	post-depo talk meeting with cocounsel on other prep	1.30
5/1/2019	Deposition	attend Dechert office, NYSBoE depo of Susan Lerner	4.00
5/7/2019	Conference Call	cocounsel talk about depositions taken, and others in Albany; strategy call	0.70
5/7/2019	Meetings	post-depo chat with co-counsel, possible harmed voters/ witnesses for Plts; potential discovery delays	1.00
5/7/2019	Deposition	Bd of Elections depo taking of Common Cause Sara Goff	2.40
5/22/2019	Conference Call	Cocounsel JP et al meeting	0.80
5/22/2019	Document Review	Review and add edit/comment on expert Marc Meredith expert study ( draft 3)	1.90
5/24/2019	Conference Call	co-counsel J Powers, Morgan (Dechert) and I review draft expert report with Marc Meredith; qs on his methods	2.20
5/30/2019	Conference Call	Counsel parties call to Court clerk on setting up date with Judge Nathan	0.30
5/31/2019	Document Review	Rev internal counsel emails on Def doc production etc	2.40
6/17/2019	Telephone Call	Plt cocounsel meeting on Def initial disclosures, Extension for depos, and subpenas	0.40
6/28/2019	Document Review	Plts co-counsel emails with Def	0.30
7/3/2019	Email Exchange	Tharunyi says date set for depo of expert Meredith	0.10
7/8/2019	Document Review	rev Neil 6/27 email to BOE Esq re: Plts intention to file letter motion, disputes in discovery, e.g., lateness supplying avail for 33 fact witnesses, need depo date for M Ryan, non-respons on Plts subpoenas	0.40
7/11/2019	Document Review	Per Tharunyi, prepare ex-parte acknowledgment counsel's notice to submit to SDNY before set 6/25 settlement conf	0.20
7/11/2019	Email Exchange	co-counsel on avail to discuss draft settlemnt letter due 7/18	0.30
7/15/2019	Telephone Call	Discovery conference with SDNY Magistrate S Netburn - cancel	0.20
7/15/2019	Telephone Call	Co-counsel meeting with NY AG office on info redaction requests	0.50
7/16/2019	Telephone Call	meeting on Brehm emails re settlement conference, e.g., old JP emails	0.50

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	Ouco 1.11 01 001	10 7 10 11 011 Dodamont 100 1 1 1100 01/01/20 1 0100	
7/17/2019	Telephone Call	Plts counsel meeting on settlement discussion with Def counsel	0.80
7/18/2019	Email Exchange	various emails on comments to draft letter to court, and, discussion of State BoE's strict position that inactives must vote by affidavit ballot	0.20
7/18/2019	Document Review	Pits counsel ex-parte pre-settlement conference letter to Court	0.20
7/19/2019	Document Review	ECF Magis Netburn orders parties' status report, protective order OK for AG unredacted production	0.20
7/22/2019	Telephone Call	Meet and confer with Def Bd od Elections	0.50
7/25/2019	Telephone Call	Plts' counsel discuss how inactive voters can cast regular ballot in settlement terms with SBoE Esq., for Def further consideration next week	0.80
7/29/2019	Email Exchange	Plts counsel propose a set of specific search terms to Def Esq for emails sent by 4 Def BoE staff persons, from Jan 1 2014 to date	0.20
7/29/2019	Email Exchange	discussion on collecting search terms to pursue targeted requested discovery of SBoE files and emails	0.30
8/1/2019	Telephone Call	Parties' Counsel Call in to Magistrate Netburn / Chambers re settlement conference status	1.00
8/7/2019	Telephone Call	Conf call with A+P on intervention issues	0.60
8/9/2019	Telephone Call	Phone call with Niagara County resident farm worker	0.70
8/13/2019	Document Review	Def McGann sends to Plts Esq his scans of Lerner and Goff depo exhibits -docs; review	0.40
9/10/2019	Document Review	ECF re discovery dispute over BoE production of docs	0.20
9/23/2019	Email Exchange	Confirming I will attend 10/7 pretrial meeting with SDNY, and to list me as trial counsel, vis Hillary B - Dechert; Rec'd Plts' Affirmative Designations excel chart, depotranscripts for Homan, Novullo and D Roberts	0.40
9/24/2019	Document Review	clean draft of Plts proposed findings of facts and laws, J Powers	0.70
9/24/2019	Document Review	brief review depo transcript of NYC BoE Ryan; team emails on possible counters- and objections to depos facts, etc	0.50
9/24/2019	Document Review	Review of draft Joint pretrial report	0.60
9/25/2019	Email Exchange	discussions on exhibits filings, circulation of draft Lerner declaration	0.30
9/26/2019	Document Review	ECF- Jt Letter to Judge Nathan on parties' exhibits	0.10
10/3/2019	Meetings	Parties' counsel confer on pre-trial conference, outstanding issues	0.80
10/4/2019	Email Exchange	send parties' motion to strike, reply brief to intern Lysette in prep for Monday SDNY hearing	0.30
10/4/2019	Meetings	prep for SDNY Judge Nathan's pre-trial hearing	1.00
10/7/2019	Email Exchange	tasks, steps to F/U take on how meet court's pretrial deadlines	0.40
10/7/2019	Meetings	post-hearing co-counsel meeting to comply with SDNY instructions due in 2 days, logistical	0.40

10/7/2019	Case 1:17-cv-0677	'Osอันฟิกระโทลเ เกษย์เหมู่ กูดิเชีย โดยที่สำคัญ เคยายัพร์ เคยายัพร์ เคยายัพร์ เลยายัง and คิเชีย ขึ้นเคร็ รู้โก๊กอ allocation for each side, instructs parties to coordinate witness order, try to resolve evid objections before trial	1.30
10/8/2019	Email Exchange	discussion on trial order of witnesses, depo witnesses' pp designations, other	0.50
10/8/2019	Meetings	talk about Monroe County - GLL in state court w FF	1.00
10/9/2019	Email Exchange	re parties counsel negotiations per pretrial agreements, for reporting to judge	0.40
10/14/2019	Telephone Call	Confirm SDNY courthouse meeting with Dechert Tiffany re laptops, pre-trial hardware	0.30
10/15/2019	Court Preparation	meet 8 AM Dechert Tiffany Lewis and external video display consultant for courtroom setup, laptop equipment, logistical security	0.50
10/15/2019	Trial	SDNY Rm 906 Day 1 8:45am to 4:15pm	6.00
10/16/2019		Day 2 8:45am to 5	6.00
10/18/2019		Day 4 - Closing Arguments 9:30 am to 1pm	4.00
	Email Exchange	·	0.30
		Plt and Def counsel emails re joint submission of trial exhibits to SDNY; data on USB	0.00
10/30/2019	Document Review	various ECF notices on court transcripts, proceedings, etc filed by court reporter	0.20
10/31/2019	Document Review	Plts letter req SDNY to grant extension of time to file post-trial briefs	0.10
11/1/2019	Editing	review and propose reducing 20 pp on all states' laws to new sections in 3 pp chart document, comply with brief's max page limits	0.40
11/1/2019	Document Review	Skim Neil's draft post-trial brief on proposed findings of facts and law	0.40
11/3/2019	Document Review	co-counsel remarks on final revised memo of law, appendices	0.10
11/4/2019	Document Review	review Plts final post-trial brief to be filed	0.60
11/4/2019	Editing	review final memo of law, need to add Appendix, sort key states, into footnote	0.20
1/13/2020	Document Review	review SDNY decision, judgment	1.20
1/23/2020	Telephone Call	co-counsel meeting on SDNY decision problems, confer with client Susan Lerner/ Common Cause on whether to appeal, pros -risks, next steps; atty fees petition - fee rates	0.50
1/29/2020	Telephone Call	co-counsel discuss attorney fees petition, rates, collecting declarations	0.40
		CommCauseState - CommCauseState CommCauseState Total:	72.90
		Jackson Chin Total:	72 90

Jackson Chin Total: 72.90

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### Comments



Date Range: 9/15/2014 - 12/21/2017

Case	Matter	Date	Person	Comment	Hours
Common C	Cause v. State B	OE			
	CommCaus	eState - CommC	auseState CommCa	useState	
		8/7/2017	Joanna Cuevas	Accepted Outlook Calendar invite from J. Powers (LCCRUL) re: Accepted: New York NVRA	0.10
		8/8/2017	Joanna Cuevas	discussion Followup email exchanges with J. Perez, J. Powers, E. Rosenberg (LCCRUL), N. Steiner (Dechert) re:	0.40
		8/8/2017	Joanna Cuevas	Re: Tuesday call Rapid research on DOJ CRD VRS website for NYS NVRA Consent	0.10
		8/8/2017	Joanna Cuevas	Decrees/Cases. Participated in case strategy conf call with Dechert, LCCRUL and LJP Caseteams with J. Powers, E. Rosenberg (LCCRUL) re: state NVRA case, etc.	0.70
		8/9/2017	Joanna Cuevas	Reviewed followup email exchanges with J. Perez, J. Powers, E. Rosenberg (LCCRUL), N. Steiner (Dechert) re: Tuesday call	0.20
		8/9/2017	Joanna Cuevas	Followup email exchanges with J. Garcia, J. Perez, and J. Powers (LCCRUL) re: RE: NY NVRA matter -	0.30
		8/9/2017	Joanna Cuevas	press release LJP Quote Brief call to J. Powers (LCCRUL) re: complaint PR.	0.10
		8/15/2017	Joanna Cuevas	DeLong (LJP Legal Fellow) with attachments re: Sample Affidavit, Intake, & Excel Sheet for Followup LJP Cada Voto Cuenta Intake/ CC NYS Followup Calls; reviewed and corrected her translation of brief intake script; reviewed deadline for calls outreach etc.	0.40
		8/15/2017	Joanna Cuevas	Time spent meeting with S. DeLong (LJP Legal Fellow) providing her brief overview of case matter and followup requirements, plaintiff identification, resources, background and sample intake/affidavits.	0.80
		8/15/2017	Joanna Cuevas	Time spent reviewing and editing S. DeLong (LJP Legal Fellow)'s translation of sample intake script for	0.40
		8/16/2017	Joanna Cuevas	potential individual plaintiffs. Followup email exchange with S. DeLong (LJP Legal Fellow) re: status update re: plaintiff identification and intake outreach followup calls	0.20
		8/21/2017	Joanna Cuevas	(Dechert) with attached draft complaint sent to LJP, LCCRUL and Dechert Caseteams; reviewed followup emails from J. Perez to LJ Admin Staff re: new accounting and time codes for case matter (R. Rosado, S. Orna, J. Cartagena, M.	0.20
		8/22/2017	Joanna Cuevas	Kaniowop <sup>\</sup> m€eting with M. Abbas/Kanioros re: L.IP Voting	0.40

	Case 1:17-cv-0677	'0-AJN-SN I	Rights Docket] Sample Affidavit &  Document 1902 of 35	
	8/22/2017	Joanna Cuevas	exchanges with M. Abbas/Kanioros re: LJP Voting Rights Docket] Sample Affidavit & Excel Sheet for	.40
	8/23/2017	Joanna Cuevas	attached draft complaint with edits and comments from J. Powers (LCCRUL) re: draft NY NVRA	.10
	8/24/2017	Joanna Cuevas	complaint, as sent to LJP, Dechert and LCCRUL Caseteams for joint collective review Followup email exchange with N. Steiner, A. Do, T. Jayaraman, H. Bonaccorsi (Dechert LLP), E. Rosenberg, J. Powers (LCCRUL), J. Perez re: scheduling strategy TC re:	.20
	8/25/2017	Joanna Cuevas	draft NY NYVA.complaint Reviewed admin email from A. Do (Dechert) re: today's call re: draft NY	.10
	8/25/2017	Joanna Cuevas	call with N. Steiner, A. Do, T. Jayaraman, H. Bonaccorsi	.50
	8/28/2017	Joanna Cuevas	(Dechert), J. Powers (LCCRUL), J.  Perez Poliowup emaii and attachment exchange with N. Steiner, A. Do, M. Espana, T. Jayaraman (Dechert LLP), J. Powers, E. Rosenberg (LCCRUL), J. Perez re: LJP edits	.20
	8/28/2017	Joanna Cuevas	with footnote sources and U.S. Census NY State 2016 Registration Data for Complaint Language and Filities to Para 7 of Draft Complaint footnote sources and U.S. Census NY State 2016 Registration Data for Complaint Language and edits to	0.30
	8/28/2017	Joanna Cuevas	sources and U.S. Census NY State 2016 Registration Data for	.60
	8/29/2017	Joanna Cuevas	Complaint Language and edits to Para 7 of Draft Complaint. Followup email and attachment 0 exchange with N. Steiner, A. Do, M. Espana, T. Jayaraman (Dechert LLP), J. Powers, E. Rosenberg (LCCRUL), J. Perez re: LJP edits with footnote sources and U.S. Census NY State 2016 Registration Data for Complaint Language and edits to Para 7 of Draft Complaint; reviewed replies from J. Powers; N.	.20
	8/31/2017	Joanna Cuevas	Followup email eychanges with N	.20
	8/31/2017	Joanna Cuevas	Proofread of finalized draft NYS	.40
	8/31/2017	Joanna Cuevas	Perez, J. Garcia and C. Perez with newly adapted quote for NEW NYS	.20
Prepared	by ClickTime on 12/28/2017	6:57:06 PM	BOE NVRA complaint filing next www.clicktime.comednesday. Pag	ge 1 of

9/1/2	017 Joanna	Cuevas	Reviewed followup emails from N.	0.20
Case 1:17-cv-			Steiner, High 1990/31/Decherting 8 of 35	0.20
			Powers, D. Robinson (LCCRUL);	
			etc. re: updates to draft complaint,	
9/2/2	017 Joanna	Cuevas	complaint filing PR next week. Reviewed email from J. Perez re:	0.10
			RE: draft NY NYVA complaint as	
			sent to J. Garcia and re: Wednesday filing & release	
9/3/2	017 Joanna	Cuevas	filing & release, Reviewed email from J. Perez re:	0.10
			RE: draft NY NYVA complaint as sent to LJP, LCCRUL, Dechert	
			Caseteams and copied to J. Garcia	
			for next week's case filing and PR.	
9/5/2	017 Joanna	Cuevas	Followup email exchange with J.	0.20
			Perez, J. Garcia, J. Powers, E. Rosenberg, D. Robinson, J. Brady	
			(LCCRUL), N. Steiner, A. Do, T.	
			Jayaraman, E. West, Hilary	
			Bonnacorsi (Dechert), re: joining	
			press call tomorrow o/b/o LJP for	
			complaint filing; reviewed followup email from J. Perez to J. Cartagena,	
			J. Garcia, C. Perez and I re: same.	
9/5/2	017 Joanna	Cuevas	Reviewed followup email and	0.20
			attachments from J. Powers	
			(LCCRUL) sent to me, J. Perez, J. Garcia, J. Powers, E. Rosenberg, D.	
			Robinson, J. Brady (LCCRUL), N.	
			Steiner, A. Do, T. Jayaraman, E.	
			West, Hilary Bonnacorsi (Dechert),	
			re: (1) November 2016 NVRA notice	
			letter; (2) an earlier September 2016 letter from the Lawyers' Committee	
			to the NYSBOE; and (3) email from	
			Bob Brehm Followup email and attachment	
9/6/2	017 Joanna	Cuevas	exchange with with J. Powers, D.	0.20
			Robinson, J. Brady (LCCRUL), H.	
			Bonnacorsi, N. Steiner, M. Espana,	
			T. Jayaraman, A. Do (Dechert), S.	
			Lerner (CC NY) re: RE: Press Advisory, NY NVRA Press Call Run	
			of Showing Trial in at 1-20 Reviewed email with attached PDFs	
9/6/2	017 Joanna	Cuevas	from J. Powers (LCCRUL) to A.	0.10
			Saini, D. Lucas, L. Rosado, S. Khan	
			(NYAG), copied to me, E.	
			Rosenberg (LCCRUL), N. Steiner	
9/6/2	017 Joanna	Cuevas	Rechert) u Perropaieu as a speakei	0.50
			for LJP for joint LCCRUL/LJP/Dechert/Common	
			Cause case filing press call,	
			answered questions from B. Bergin,	
			WNYC; reviewed followup email	
			from J. Chin re: New York sued over process for purging names from	
			voter rolls   Crain's New York	
0 = 10	047	0	Reviewed email from H. Katzman re:	0.40
9/7/2	Jir Joanna	Cuevas	Civil Rights Groups File Lawsuit	0.10
			Challenging Removal of Voters from	
9/8/2	017 Joanna	Cuevas	New York Poll Books Reviewed email from J. Perez re:	0.10
3/0/2	ori Juanina	- Outvas	LJP Newsletter e: FW: Check Out	5.10
			LatinoJustice: Civil Rights Groups	
			File Lawsuit Challenging Removal of Voters from New York Poll Books	
9/11/	2017 Joanna	Cuevas	Followup email exchange with N.	0.30

Steiner, T. Jayaraman, H.

### Case 1:17-cv-06770-AJN-SN Document 190 nacpril (Perher) F20 osphberg, 9 of 35 J. Powers (LCCRUL) re: scheduling

order for initial conference on Dec. 22; filing NOA, etc.; followup email exchanges with N. Steiner and L. Lopez (Dechert) re: filing and certifying service for my NOA. Filed NOA and Cert of Service in

0.20

9/11/2017 Joanna Cuevas

Case 1:17-cv-06770-AJN Common
Cause/New York v. Brehm et al;
reviewed ECF Docs 18 and 19

Notifications re:

U.S. District Court Southern District of New York Notice of Electronic Filing

The following transaction was entered by Cuevas Ingram, Joanna on 9/11/2017 at 12:59 PM EDT and filed on 9/11/2017 Case Name: Common Cause/New York v. Brehm et al

Filer:Common Cause/New York, Document Number:18

Case Number:1:17-cv-06770-AJN

Docket Text: NOTICE OF APPEARANCE by Joanna Elise Cuevas Ingram on behalf of Common Cause/New York,. (Cuevas Ingram, Joanna)

U.S. District Court Southern District of New York Notice of Electronic Filing

The following transaction was entered by Cuevas Ingram, Joanna on 9/11/2017 at 5:03 PM EDT and filed on 9/11/2017

Reviewed ECF SDNY Notification re:

9/11/2017	Joanna Cuevas	Case Name: Common Cause/New Brief followup phonecalls with L. Lopez (Dechert) re: filing and	0.10
9/11/2017	Joanna Cuevas	properly serving NOA. Followup email exchange with J. Perez re: Case assigned to The	0.10
9/11/2017	Joanna Cuevas	Honorable Judge Nathan. Followup email exchange with J. Perez re: NOA and filing.	0.20
9/11/2017	Joanna Cuevas	Followup email exchange with L.  Lopez, N. Steiner (Dechert) and J.	0.30
		Perez re: RE: Activity in Case 1:17- cv-06770-AJN Common Cause/New York v. Brehm et al Notice of	
		Appearance	

IIO District Count

Prepared by ClickTime on 12/28/2017 6:57:06 PM

9/12/2017

Joanna Cuevas

U.S. DISTRICT COURT

### Case 1:17-cv-06770-AJN-SN Document 19 Southern District of New York age 10 of 35 Notice of Electronic Filing

The following transaction was entered on 9/12/2017 at 2:41 PM EDT and filed on 9/12/2017 Case Name: Common Cause/New York v. Brehm et al Case Number:1:17-cv-06770-AJN

Document Number: No document attached

### Docket Text:

\*\*\*NOTICE TO ATTORNEY TO RE-FILE DOCUMENT - EVENT TYPE ERROR. Notice to Attorney Douglas A. Kellner to RE-FILE Document [17] Notice of Appearance. Use the event type Letter found under the event list Accepted Outlook invite from J.

Perez re: LJP Internal followup meeting for 09/27/18, 12 noon-2pm

Reviewed SUNY EUF NOTIFICATION re: and 30 page limit do not apply. U.S. District Court Southern District of New York

Notice of Electronic Filing

The following transaction was entered by Powers, John on 9/22/2017 at 5:31 PM EDT and filed on 9/22/2017 Case Name: Common Cause/New

York v. Brehm et al Case Number:1:17-cv-06770-AJN

Filer: Common Cause/New York, Document Number:20

### Docket Text:

MOTION for John Powers to Appear Pro Hac Vice . Filing fee \$ 200.00, receipt number 0208-14161354. Motion and supporting papers to be reviewed by Clerk's Office staff. Document filed by Common Cause/New York,. (Attachments: # (1) Affidavit of John Powers, # (2) Exhibit A - Maryland Certificate of Good Standing, # (3) Exhibit B -District of Columbia Certificate of Good Standing, # (4) Text of Joined and participated in Press

Conference with K. Clarke (LCCRUL), N. Steiner (Dechert), S. Lerner (CCNY) re: filing in CC v.

NYS BOE. Reviewed tollowup email exchange between N. Steiner, T. Jayaraman, H. Bonnacorsi, A. Do, M. Espana

(Dechert), J. Perez, myself, J. Powers, E. Rosenberg (LCCRUL) re: scheduling\_motion.practice.u.s.

**District Court** 

Joanna Cuevas

Joanna Cuevas

Joanna Cuevas

Prepared by ClickTime on 12/28/2017 6:57:06 PM

9/25/2017

9/26/2017

10/3/2017

9/20/2017

9/22/2017

Joanna Cuevas

Joanna Cuevas

www.clicktime.com

0.60

0.20

0.10

0.10

The following transaction was entered on 10/3/2017 at 12:09 PM EDT and filed on 10/3/2017 Case Name: Common Cause/New York v. Brehm et al

Case Number:1:17-cv-06770-AJN

Filer:

Document Number:21(No document

attached)

Docket Text:

ORDER granting [20] Motion for John Powers to Appear Pro Hac Vice (HEREBY ORDERED by Judge

Alison I Nathan)(Text Only Order) Reviewed followup email exchange with T. Jayaraman (Dechert), J. Powers (LCCRUL) to LJP, LCCRUL and Dechert Caseteams re: Case

Briefing Schedule Reviewed SDNY ECF Notifications

re: Dkt. Nos. 22-28 Affidavits of Service for U.S. District Court Southern District of New York Notice of Electronic Filing

The following transaction was entered by Steiner, Neil on 10/10/2017 at 5:30 PM EDT and filed on 10/10/2017 Case Name: Common Cause/New York v. Brehm et al. Case Number:1:17-cv-06770-AJN

Filer: Common Cause/New York, Document Number:22

Docket Text: AFFIDAVIT OF SERVICE of Summons and Complaint,. Robert A. Brehm served on 9/11/2017, answer due 10/2/2017. Service was accepted by Kimberly Galvin, Esq.. Document filed by Common

Cause/New York,. (Steiner, Neil) U.S. District Court Southern District of New York

The following transaction was entered by Steiner, Neil on 10/10/2017 at 5:32 PM EDT and filed on 10/10/2017

Case Name: Common Cause/New York v. Brehm et al

Notice of Electronic Filing

Case Number:1:17-cv-06770-AJN Reviewed SDNY ECF Notice re: II & District Court

10/4/2017 Joanna Cuevas

10/10/2017 Joanna Cuevas

10/11/2017 Joanna Cuevas

0.10

0.10

### Case 1:17-cv-06770-AJN-SN Document 19 Notice of Electronic Films Page 12 of 35

The following transaction was entered on 10/11/2017 at 8:00 AM EDT and filed on 10/11/2017 Case Name: Common Cause/New York v. Brehm et al Case Number:1:17-cv-06770-AJN

Document Number: No document attached

Docket Text:

>>>NOTICE REGARDING PRO HAC VICE MOTION. Regarding Document No. [28] MOTION for Ezra D. Rosenberg to Appear Pro Hac Vice . Filing fee \$ 200.00, receipt number 0208-14226997. Motion and supporting papers to be reviewed by Clerk's Office staff.. The document

**District Court** 

Southern District of New York Notice of Electronic Filing

The following transaction was entered on 10/12/2017 at 8:49 AM EDT and filed on 10/12/2017 Case Name: Common Cause/New York v. Brehm et al Case Number:1:17-cv-06770-AJN

Filer:

attached)

Docket Text:

ORDER granting [28] Motion for Ezra D. Rosenberg to Appear Pro Hac Vice (HEREBY ORDERED by Followup email exchange with J. Perez re: filing his NOA in Case 1:17-

cv-06770-AJN Common Cause/New York v. Brehm et al Notice of

Appearance

Reviewed SDNY ECF re: U.S.

**District Court** 

Southern District of New York Notice of Electronic Filing

The following transaction was entered by Perez, Jose-Luis on 10/17/2017 at 5:30 PM EDT and filed on 10/17/2017 Case Name: Common Cause/New York v. Brehm et al. Case Number:1:17-cv-06770-AJN

Filer: Common Cause/New York, Document Number:30

Docket Text: NOTICE OF APPEARANCE by Jose-Luis Perez on behalf of Common Cause/New York,. (Perez, Jose-Reviewed ECF Notification re: U.S.

10/12/2017 Joanna Cuevas

Document Number:29(No document

10/12/2017 Joanna Cuevas

10/17/2017 Joanna Cuevas

10/18/2017 Joanna Cuevas Prepared by ClickTime on 12/28/2017 6:57:06 PM

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www.clicktime.comtrict Court

The following transaction was entered on 10/18/2017 at 5:11 PM EDT and filed on 10/18/2017 Case Name: Common Cause/New York v. Brehm et al Case Number:1:17-cv-06770-AJN

Filer:

Document Number:No document attached

Docket Text:

DISTRICT COURT

Set/Reset Deadlines: Robert A. Brehm answer due 11/17/2017; Douglas A. Kellner answer due 11/17/2017; Peter S. Kosinski answer due 11/17/2017; Gregory P. Peterson answer due 11/17/2017; Andrew J. Spano answer due 11/17/2017; Todd D. Valentine answer due 11/17/2017. Motions due by 11/17/2017. Responses due Reviewed SDNY ECF Notification re:

U.S. District Court

Southern District of New York Notice of Electronic Filing

The following transaction was entered on 10/18/2017 at 5:10 PM EDT and filed on 10/18/2017 Case Name: Common Cause/New York v. Brehm et al

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Case Number:1:17-cv-06770-AJN

Filer:

Document Number:32

Docket Text:

ORDER: granting in part and denying in part [31] Letter Motion for Extension of Time to Answer. SO ORDERED/DENIED. Answer due by 11/17/2017. Motion due by 11/17/2017. Response due by 12/22/2017. Reply due by 1/12/2018. Reviewed SDNY ECF re: U.S.

10/18/2017 Joanna Cuevas

10/18/2017 Joanna Cuevas

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The following transaction was entered by Steiner, Neil on 10/18/2017 at 11:23 AM EDT and filed on 10/18/2017 Case Name: Common Cause/New York v. Brehm et al Case Number:1:17-cv-06770-AJN

Filer:Common Cause/New York, Document Number:31

Docket Text:

LETTER MOTION for Extension of Time to File Answer addressed to Judge Alison J. Nathan from Neil A. Steiner dated October 18, 2017. Reviewed SDNY ECF Notification re: U.S. District Court Southern District of New York

The following transaction was entered by Quail, Brian on 11/2/2017 at 9:39 AM EDT and filed on 11/2/2017

Case Name: Common Cause/New

York v. Brehm et al

Notice of Electronic Filing

Case Number:1:17-cv-06770-AJN

Filer:Robert A. Brehm Douglas A. Kellner Peter S. Kosinski Gregory P. Peterson Andrew J. Spano Todd D. Valentine Document Number:33

Docket Text:

NOTICE OF APPEARANCE by Brian Lee Quail on behalf of Robert A. Brehm, Douglas A. Kellner, Peter S. Kosinski, Gregory P. Peterson, Briefly Reviewed U.S. District Court

Southern District of New York

11/17/2017 Joanna Cuevas

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Joanna Cuevas

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Prepared by ClickTime on 12/28/2017 6:57:06 PM

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### Case 1:17-cv-06770-AJN-SN Document 190-1 Filed 01/31/20 Page 15 of 35

The following transaction was entered by Cartagena, Nicholas on 11/17/2017 at 5:09 PM EST and filed on 11/17/2017

Case Name: Common Cause/New

York v. Brehm et al

Case Number:1:17-cv-06770-AJN

Filer:Robert A. Brehm Douglas A. Kellner Peter S. Kosinski Gregory P. Peterson Andrew J. Spano Todd D. Valentine Document Number:37

Docket Text:

FIRST MEMORANDUM OF LAW in Support re: [36] FIRST MOTION to Dismiss . . Document filed by Robert A. Brehm, Douglas A. Kellner, Peter S. Kosinski, Gregory P. Peterson, Andrew J. Spano, Todd D. Reviewed U.S. District Court Southern District of New York

Notice of Electronic Filing

The following transaction was entered by McCann, William on 11/17/2017 at 1:00 PM EST and filed on 11/17/2017 Case Name: Common Cause/New York v. Brehm et al

Case Number:1:17-cv-06770-AJN

Filer:Robert A. Brehm Douglas A. Kellner Peter S. Kosinski Gregory P. Peterson Andrew J. Spano Todd D. Valentine **Document Number:35** 

Docket Text:

NOTICE OF APPEARANCE by William J. McCann, Jr on behalf of Robert A. Brehm, Douglas A. Kellner, Peter S. Kosinski, Gregory P. Peterson, Andrew J. Spano, Todd D. Valentine. (McCann, William); U.S. District Court Southern District of New York Notice of Electronic Filing

The following transaction was entered by Cartagena, Nicholas on 11/17/2017 at 1:00 PM EST and filed on 11/17/2017 Case Name: Common Cause/New York v. Brehm et al Reviewed Southern District of New

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Prepared by ClickTime on 12/28/2017 6:57:06 PM

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Page 1 of 1

Case 1:17-cv-06770-AJN-SN Document 190-1 Filed 01/31/20 Page 16 of 35

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The following transaction was entered by Cartagena, Nicholas on 11/17/2017 at 5:13 PM EST and filed on 11/17/2017

Case Name: Common Cause/New

York v. Brehm et al

Case Number:1:17-cv-06770-AJN

Filer:Robert A. Brehm Douglas A. Kellner Peter S. Kosinski Gregory P. Peterson Andrew J. Spano Todd D. Valentine Document Number:39

Docket Text: CERTIFICATE OF SERVICE of Motion to Dismiss served on Common Cause on 11/17/2017. Document filed by Robert A. Brehm, Douglas A. Kellner, Peter S. Kosinski, Gregory P. Peterson, Andrew J. Spano, Todd D. Valentine. (Cartagena, Nicholas); U.S. District Court Southern District of New York Notice of Electronic Filing

The following transaction was entered by Cartagena, Nicholas on 11/17/2017 at 5:07 PM EST and filed on 11/17/2017 Reviewed U.S. District Court Southern District of New York

Notice of Electronic Filing

The following transaction was entered by Cartagena, Nicholas on 11/17/2017 at 5:11 PM EST and filed on 11/17/2017 Case Name: Common Cause/New York v. Brehm et al. Case Number:1:17-cv-06770-AJN

Filer:Robert A. Brehm Douglas A. Kellner Peter S. Kosinski Gregory P. Peterson Andrew J. Spano Todd D. Valentine Document Number:38

Docket Text: DECLARATION of Nicholas R. Cartagena in Support re: [36] FIRST MOTION to Dismiss .. Document filed by Robert A. Brehm, Douglas A. Kellner, Peter S. Kosinski, Gregory P. Peterson, Andrew J. Spano, Todd D. Valentine. (Attachments: # (1) Exhibit)(Cartagena Nicholas): I LS Do N Steiner (Dechert) and F

11/17/2017 Joanna Cuevas

11/21/2017 Joanna Cuevas

Prepared by ClickTime on 12/28/2017 6:57:06 PM

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### Case 1:17-cv-06770-AJN-SN Document 199 and Local and Local All Page 17 of 35

Caseteams re: Defendant's MTD; Letter to J. Nathan under Individual

11/21/2017 Joanna Cuevas

Rule 3(F) Reviewed SDNY ECF Notification re:

.S. District Court

Southern District of New York Notice of Electronic Filing

The following transaction was entered on 11/21/2017 at 3:40 PM EST and filed on 11/21/2017 Case Name: Common Cause/New

York v. Brehm et al.

Case Number:1:17-cv-06770-AJN

Filer:

Document Number:40

**Docket Text:** 

ORDER: On November 17, 2017, Defendants filed a motion to dismiss. Pursuant to Rule 3.F of this Court's Individual Practices in Civil Cases, on or before November 27, 2017, Plaintiff must notify the Court and its adversary in writing whether (1) it intends to file an amended pleading and when it will do so or (2) it will rely on the pleading being attacked. Plaintiff is on notice that declining to amend its pleadings to timely respond to a fully briefed argument in the Defendant's November 17 motion to dismiss may well constitute a waiver of the Plaintiff's right to use the amendment process to cure any defects that have been made apparent by the Defendant's briefing. If Plaintiff chooses to amend, Defendant may then (a) file

11/22/2017 Joanna Cuevas

conference call with H. Bonnacorsi, N. Steiner, A. Do (Dechert), and Dechert Caseteam, J. Powers, E. Rosenberg (LCCRUL) re: NYS BOE -

11/22/2017 Joanna Cuevas

Next Steps w/r/t MTD Accepted Outlook Calendar invite from H. Bonaccorsi re: NYS BOE LJP, LCCRUL, Dechert Case Conference/Strategy Call re: Next

11/22/2017 Joanna Cuevas

Steps w/r/t MTD Followup email exchange with H. Bonnacorsi (Dechert), J. Powers (LCCRUL), as copied to Dechert, LJP and LCCRUL Caseteams re:

Letter to J. Nathan under Individual

Rule 3(F)

11/27/2017 Joanna Cuevas

Reviewed SDNY ECF Notification re:

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U.S. DISTRICT COURT

### Case 1:17-cv-06770-AJN-SN Document 19 of 19 Notice of Electronic Filing Page 18 of 35

The following transaction was entered by Steiner. Neil on 11/27/2017 at 2:37 PM EST and filed on 11/27/2017 Case Name: Common Cause/New York v. Brehm et al Case Number:1:17-cv-06770-AJN

Filer: Common Cause/New York, Document Number:41

LETTER addressed to Judge Alison

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J. Nathan from Neil A. Steiner dated November 27, 2017 re: Response to Court's Order entered November 21, 2017 (Doc. 40). Document filed by Followup email exchange with J. Powers (LCCRUL), H. Bonnacorsi, A. Do, T. Jayaraman, M. Espana, N. Steiner (Dechert), E. Rosenberg, S. Weiss (LCCRUL) J. Perez re: scheduling case strategy call re: Outline for Opposition to MTD Reviewed followup email notes, and attachments from J. Powers (LCCRUL) as originally copied to A.

12/13/2017 Joanna Cuevas

12/14/2017 Joanna Cuevas

12/14/2017 Joanna Cuevas

12/16/2017 Joanna Cuevas

12/18/2017 Joanna Cuevas

12/18/2017 Joanna Cuevas

Do (Dechert); Steiner, Neil <neil.steiner@dechert.com>; Joanna

Cuevas Ingram <jcuevas@latinojustice.org>; Ezra

Rosenberg

<erosenberg@lawyerscommittee.org

>; Bonaccorsi, Hilary

<Hilary.Bonaccorsi@dechert.com>:

Jayaraman, Tharuni

<tharuni.jayaraman@dechert.com>;

Jose Perez

<iperez@latinojustice.org>; Espana,

Mauricio

<Mauricio.Espana@dechert.com>;

Sam Weiss

<sweiss@lawyerscommittee.org> re: Legal Research and Analysis for Opposition Brief for Opposition to

Accepted Outlook invite from H. Bonnacorsi (Dechert) re: Accepted: Brehm/NY - Call re: Response to

MTD Time spent reviewing outline for Opp

to MTD Brief.

Reviewed followup email exchange

between J. Powers (LCCRUL), A. Do (Dechert), J. Perez, as originally copied to Dechert, LJP and LCCRUL Co-Counsel re: RE: Activity in Case 1:17-cv-06770-AJN Common Cause/New York v. Brehm et al

Order, contacting clerk re: mistaken filing; reviewed followup emails and attachments from J. Powers (LCCRUL) and A. Do (Dechert) re:

draft sections of Opposition Brief. Reviewed SDNY ECF Notification re:

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The following transaction was entered on 12/18/2017 at 5:00 PM EST and filed on 12/18/2017 Case Name: Common Cause/New York v. Brehm et al Case Number:1:17-cv-06770-AJN

ORDER: On November 17, 2017,

Document Number:42

Docket Text:

Defendants filed a motion to dismiss. Opposition to Defendants' motion was due on December 1, 2017, but as of December 18, 2017, Plaintiff has failed to file anopposition to Defendants' motion or request a deadline extension. Therefore, no later January 8, 2018, Plaintiff shall submit a letter to the Court indicating that it wishes to file an opposition to the motion or does not wish to file an opposition to the motion to dismiss. (As further set forth in this Order.) Failure to submit any letter to the Court by January 8, 2018 shall result in DISMISSAL of the action for failure to prosecute. (Signed by Reviewed followup email from H. Bonnacorsi (Dechert). Reviewed U.S. District Court

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Southern District of New York Notice of Electronic Filing

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The following transaction was entered by Steiner, Neil on 12/19/2017 at 12:00 PM EST and filed on 12/19/2017 Case Name: Common Cause/New York v. Brehm et al Case Number:1:17-cv-06770-AJN

Filer: Common Cause/New York. Document Number:43

**Docket Text:** 

LETTER addressed to Judge Alison J. Nathan from Neil A. Steiner dated December 19, 2017 re: Courts Order dated December 18, 2017 Dkt. 42. Document filed by Common Reviewed followup emails and attached Drafts of Opposition to MTD Brief from A. Do (Dechert); J. Powers (LCCRUL); reviewed followup emails from H. Bonnacorsi (Dechert), Reviewed U.S. District Court

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12/20/2017 Joanna Cuevas

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Southern District of New York

### Case 1:17-cv-06770-AJN-SN Document 190-1 Filed 01/31/20 Page 20 of 35

12/21/2017 Joanna Cuevas

The following transaction was entered on 12/20/2017 at 11:25 AM EST and filed on 12/20/2017 Case Name: Common Cause/New

York v. Brehm et al.

Case Number:1:17-cv-06770-AJN

Filer:

Document Number:44

Docket Text:

MEMO ENDORSEMENT: on re: [43] Letter filed by Common Cause/New York. ENDORSEMENT: The parties are instructed to file their briefing in accordance with the schedule set by the Court on October 18, 2017 and to disregard the instructions in its December 18 order. (Signed by Judge Alison J. Nathan on Reviewed followup email and

attached draft Opposition to MTD

redline and revised draft from E. Rosenberg (LCCRUL), reviewed replies from A. Do (Dechert), E. Rosenberg, N. Steiner (Dechert);

reviewed Outlook Calendar call invite from J. Powers (LCCRUL); Followup email exchange with J.

Powers (LCCRUL), Do, Anna <Anna.Do@dechert.com>;

Bonaccorsi, Hilary

<Hilary.Bonaccorsi@dechert.com>;

Steiner, Neil

<neil.steiner@dechert.com>; Ezra

Rosenberg

<erosenberg@lawyerscommittee.org

>; Jose Perez

<jperez@latinojustice.org>;

Jayaraman, Tharuni

<tharuni.jayaraman@dechert.com>;

Sam Weiss

<sweiss@lawyerscommittee.org>;

Shorey, Katherine

<Katherine.Shorey@dechert.com>

re: Do, Anna

<Anna.Do@dechert.com>;

Bonaccorsi, Hilary

<Hilary.Bonaccorsi@dechert.com>;

Steiner, Neil

<neil.steiner@dechert.com>; Ezra

Rosenberg

<erosenberg@lawyerscommittee.org

>; Jose Perez

<jperez@latinojustice.org>;

Jayaraman, Tharuni

<tharuni.jayaraman@dechert.com>;

Sam Weiss

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Common Cause v. State BOE Total:

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